

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GERARD LAFFAN,

Plaintiff,

v.

SANTANDER BANK, N.A., et al.,

Defendants.

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CIVIL ACTION NO. 5:13-cv-04040-JLS

JOINT STATUS REPORT

Pursuant to the Court's May 5, 2015 Order staying this Action, Plaintiff Gerard Laffan, and Defendants Santander Bank, N.A., American Modern Insurance Group, Inc. ("AMIG"), and Atlas Insurance Agency, Inc. ("Atlas") (collectively, the "Parties"), hereby report to the Court as follows:

1. As previously reported to the Court, the Parties reached a settlement in principle after a full day of mediation on April 24, 2015.
2. The Parties have been diligently working to prepare a comprehensive settlement agreement and all related settlement documents, including class notices and proposed orders.
3. While the Parties originally planned to file a motion for preliminary approval of the settlement on or before June 10, 2015, the parties need additional time to finalize the settlement agreement and exhibits.
4. Accordingly, the Parties intend to file a motion for preliminary approval on or before June 22, 2015.
5. In light of the above, the Parties request that the Court continue the stay pending approval of the settlement by the Court.

Dated: June 10, 2014

Respectfully submitted,

**KESSLER TOPAZ
MELTZER & CHECK, LLP**

s/ Tyler S. Graden (with consent)

Peter A. Muhic (PA 73501)
Tyler S. Graden (PA 205844)
Samantha E. Jones (PA 311829)
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056
Email: pmuhic@ktmc.com
Email: tgraden@ktmc.com
Email: sjones@ktmc.com

NIX PATTERSON & ROACH, LLP

Christopher Johnson
3600 North Capital of Texas Highway
Building B, Suite 350
Austin, TX 78746
Tel: (512) 328-5333
Fax: (512) 328-5335
Email: cjohnson@npraustin.com

*Attorneys for Plaintiff and
The Proposed Class*

BALLARD SPAHR LLP

s/ Christopher J. Willis

Christopher J. Willis
Sarah T. Reise
Stephanie H. Jackman
999 Peachtree Street, Suite 1000
Atlanta, GA 30309
Email: willisc@ballardspahr.com
Email: reises@ballardspahr.com
Email: jackmans@ballardspahr.com

BALLARD SPAHR LLP

Joel E. Tasca
1735 Market Street, 51st Floor
Philadelphia, PA 19103
Email: tasca@ballardspahr.com

Attorneys for Santander Bank, N.A.

BAKER & HOSTETLER LLP

s/ Robert J. Tucker (with consent)

Rodger L. Eckelberry
Joseph E. Ezzie
Mark A. Johnson
Robert J. Tucker
65 East State Street, Suite 2100
Columbus, OH 43215
Email: reckelberry@bakerlaw.com
Email: jezzie@bakerlaw.com
Email: mjohnson@bakerlaw.com
Email: rtucker@bakerlaw.com

STEVENS & LEE

Daniel B. Huyett
111 N. Sixth Street
P.O. Box 679
Reading, PA 19603-0679
Email: dbh@stevenslee.com

*Attorneys for Defendants American Modern
Insurance Group, Inc. and Atlas Insurance
Agency, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2015, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's electronic filing system (CM/ECF) upon all counsel of record.

s/ Christopher J. Willis
Christopher J. Willis